

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re: Kandise Nadine Lucas,

Case No. 20-33177-KRH

Debtor,

Chapter 13

Amanda Simons,

Plaintiff,

v.

Adv. Pro No. 20-03143-KRH

Kandise Nadine Lucas,

Defendant.

**AMENDED CONSENT MOTION TO EXTEND TIME TO FILE RESPONSE TO
COMPLAINT FILED BY AMANDA SIMONS**

NOW comes Defendant, Kandise Nadine Lucas, (“defendant”) by counsel, and represents that Plaintiff, through counsel Todd Ritter, has agreed to the Consent Motion to Extend Time to File Response to Plaintiff’s Complaint filed on November 9, 2020 for four weeks from the date of December 14, 2020, through and including January 14, 2020.

WHEREFORE, Kandise Nadine Lucas, Defendant, has been in quarantine due to COVID exposure and intends to hire other Counsel, James Wilson, who will seek permission as special counsel and substitute for Kimberly A. Chandler, and hereby prays that this honorable court enter an order extending time to respond to the Complaint for four weeks from December 14, 2020, and for any other relief that is just and proper.

Respectfully submitted,

Kandise Nadine Lucas

Kimberly A. Chandler, VSB#47897
Chandler Law Firm
P.O. Box 17586
Richmond, Virginia 23226
804-353-1971

By: /s/ Kimberly A. Chandler
Kimberly A. Chandler VSB 47897
Counsel for Debtor

CERTIFICATE OF MAILING

I hereby certify that on December 4, 2020, a copy of the foregoing Motion to Extend Time to File Response was electronically transmitted and/or mailed to Carl M. Bates, the Chapter 13 Trustee, and to Todd M. Ritter, Esquire at Daniels, Williams, tuck & Ritter, Counsel for the Plaintiff.

/s/ Kimberly A. Chandler
Kimberly A. Chandler VSB 47897

Service List

Carl M. Bates,
Chapter 13 Trustee
P.O. Box 1819
Richmond, VA 23218

Todd M. Ritter, Esquire (VSB # 40020)
Daniels, Williams, Tuck & Ritter
11901 Iron Bridge Road
P.O. Box 3570
Chester, Virginia 23831
(804) 748-9803
(804) 796-2706 (fax)
tritter@danielswilliamstuckandritter.com

Kimberly A. Chandler, VSB#47897
Chandler Law Firm
P.O. Box 17586
Richmond, Virginia 23226
804-353-1971